

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**SHOSHANA HEBISHI,**

Plaintiff,

Honorable Terrence G. Berg

Magistrate Laurie J. Michelson

-v-

Case No. 13-cv-10253

**UNITED STATES OF AMERICA; FRONTIER AIRLINES, INC.; JOHN BRAND**, in his individual capacity; **UNKNOWN FBI AGENT 1**, in his individual capacity; **UNKNOWN FBI AGENT 2**, in his individual capacity; **MARK DEBEAU**, in his individual capacity; **JEREMY BOHN**, in his individual capacity; **CAPTAIN PATRICK DRISCOLL**, in his individual capacity; **OFFICER GRANT**, in his individual capacity; **LT. M. WASIUKANIS**, in his individual capacity; **TOYA PARKER**, in her individual capacity; **DT. CARMONA**, in his or her individual capacity; **OFFICER JOHNSON**, in his or her individual capacity; **CORPORAL BRADLEY**, in his or her individual capacity; **UNKNOWN CBP OFFICER**, in his individual capacity; **DAVID LAKATOS**, in his individual capacity; **NATHANIAL DEVINS**, in his individual capacity; **UNKNOWN TSA AGENT 1**, in his individual capacity; **UNKNOWN TSA AGENT 2**, in her individual capacity; **ROBERT BALL**, in his individual capacity; **UNKNOWN ICE OFFICER**, in his individual capacity; and **PAUL BRUMLEY**, in his individual capacity;

Defendants.

-and-

**MARK DeBEAU, OFFICER GRANT, TOYA PARKER, DT. CARMONA, OFFICER JOHNSON, JEREMY BOHN, CAPTAIN PATRICK DRISCOLL, LT. M. WASIUKANIS, and CORPORAL BRADLEY,**

Cross-Plaintiffs,

-v-

**FRONTIER AIRLINES, INC.,**

Cross-Defendant.

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**AFFIDAVIT OF THOMAS J. NAUGHTON**

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STATE OF MICHIGAN       )  
  )  
COUNTY OF WAYNE       )

THOMAS J. NAUGHTON, being first duly sworn, deposes and states as follows:

1. I am the Chief Executive Officer of the Wayne County Airport Authority.

2. In my capacity as the Chief Executive Officer, I lead the day-to-day management of the Wayne County Airport Authority and its staff of more than five hundred professionals. My duties and responsibilities include – without limitation – those prescribed by Section 114(4) of the Aeronautics Code, M.C.L. § 259.114(4).

3. I delegated full and complete settlement authority to Emily Neuberger, Senior Vice President and General Counsel of the Wayne County Airport Authority, and requested that she attend the upcoming settlement conference on December 11, 2013 as my designee.

4. Ms. Neuberger agreed to attend the settlement conference on December 11, 2013 as my designee.

5. Attending the settlement conference on December 11, 2013 would pose an undue hardship. In addition to my day-to-day responsibilities,

I have a meeting with the Wayne County Airport Authority's senior managers at 2:00 p.m. on December 11, 2013. It is imperative that I attend this meeting. I will be addressing important policy-related matters and matters from the last Wayne County Airport Authority Board meeting of the year, which is scheduled for 2:30 p.m. on December 10, 2013. Unfortunately, I am unable to reschedule my meeting with the senior managers. The meeting must occur before the end of the year, and December 11, 2013 is the only date on which the meeting can occur.

Undoubtedly, there will be matters from the Board meeting to which I will need to attend before my meeting with the senior managers. Given the close proximity of the meetings, the morning of December 11, 2013 is the only time that I will have to attend to such matters.

Further, affiant sayeth not.

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Thomas J. Naughton

Subscribed and Sworn to Before me  
this \_\_\_\_ day of \_\_\_\_\_, 2013.

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Notary Public

\_\_\_\_\_ County, Michigan

My Commission Expires: \_\_\_\_\_